

# Plaintiffs'

## Exhibit 2

## ETF COLLECTION SUMMARY

The parties engaged Setec Investigations to perform some aspects of the collection, as well as data filtering, under the direction of Heyl Royster.

### EMAIL ACCOUNTS

- Martin & Schlafly –
  - Primary Accounts:
    - [edmartin1791@gmail.com](mailto:edmartin1791@gmail.com)
      - Entire account collected in March 2018
      - Estimated size: ~200 GB
    - [johnschlafly@gmail.com](mailto:johnschlafly@gmail.com)
      - Entire account collected in March 2018
      - Estimated size: 35 GB
      - Email count: 313,296 messages
  - Search terms
    - Ed Martin Account:
      - Martin account initially filtered by an initial set of terms with a date restriction of 1/1/2015 through 12/31/2017. [[Ed\\_s Email - Search Term List - Final \(sent 3-23-18\) - To Setec.xlsx](#)]
      - Martin account then filtered by a set of revised terms. [[Martin and Schlafly - Final Search Terms \(3 29 18\).XLSX](#)]
      - Then adjustments to the following two terms were made:
        - 1. Prior: "[okrnewalive.com](http://okrnewalive.com) (1/1/2015 --> 12/31/2017)"
        - Now: "[okrncw@live.com](mailto:okrncw@live.com) (1/1/2015 --> 12/31/2017)"
        - 2. Prior: "James OR Sanders (1/1/2015 --> 12/31/2017)"
        - Now: "[Sanders](#) (1/1/2015 --> 12/31/2017)"
- Schlafly account filtered by an initial set of terms. [[FINAL - Schlafly - Search Terms - gmail \(sent 3 30 18\).XLSX](#)]
- Both accounts then further filtered by a set of updated terms. [[Culling Criteria.xlsx](#)]
- Both accounts then further filtered by a set of final terms. [[Culling Criteria as of 4-6-18.xlsx](#)]

- Other Accounts:
  - [john@pseagles.com](mailto:john@pseagles.com)
    - Estimated size: 4 MB
    - Email count: 44 messages
- Other Custodians –
  - Bruce Schlafly -
    - Account Details:
      - [jmschlaflly@yahoo.com](mailto:jmschlaflly@yahoo.com)
      - [bschlaflly@yahoo.com](mailto:bschlaflly@yahoo.com)
      - [bschlafllymd@gmail.com](mailto:bschlafllymd@gmail.com)
    - All accounts were collected with a date restriction of 1/1/2015 through 12/31/2017.
    - The accounts were filtered by a set of search terms. [[Bruce Schlafly - Search Terms Revised \(1\).xlsx](#)]

## **ADDITIONAL GOOGLE DATA**

- Google Drive:
  - Files associated with [edmartin1791@gmail.com](mailto:edmartin1791@gmail.com) were collected.
    - Estimated size: 11.3 GB
    - File count: 2,547 files
  - Files associated with [johnschlaflly@gmail.com](mailto:johnschlaflly@gmail.com) were collected.
    - Estimated size: 1.89 GB
    - File count: 213 files
- Google Hangouts:
  - Chat data associated with [edmartin1791@gmail.com](mailto:edmartin1791@gmail.com) was collected.
  - Chat data associated with [johnschlaflly@gmail.com](mailto:johnschlaflly@gmail.com) was collected.

## **COMPUTER IMAGES**

Avansic was engaged to image a number of devices:

- HP Laptop (Schlafly)
- Samsung Flip phone (Schlafly)
- HP Pavilion (Martin)
- Macbook Air (Martin)
- iPhone 8 (Martin)

(See Chain of Custody document here [MartinSchlaflyCOC.PDF](#).)

The images were then sent to Setec for indexing and filtering.

Setec applied a set of search terms to the images with a date range of 1/1/2015 through 12/31/2017 [[SearchTermReport-20180508215317-4.pdf](#)].